

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Kaeli Garner,, et al., Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

Amazon.com, Inc., et al.,

Defendants.

No. 2:21-cv-00750-RSL  
(Consolidated)

CLASS ACTION

DECLARATION OF ALEXANDER COHEN  
IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS' MOTION  
FOR PROTECTIVE ORDER PRECLUDING  
THE DEPOSITION OF ITS SENIOR VICE  
PRESIDENT OF DEVICES AND SERVICES

NOTE ON MOTION CALENDAR:  
September 8, 2023

COHEN DECLARATION ISO PLAINTIFFS'  
OPPOSITION TO DEFENDANTS' MOTION FOR  
PROTECTIVE ORDER

**BYRNES ♦ KELLER ♦ CROMWELL LLP**

38TH FLOOR  
1000 SECOND AVENUE  
SEATTLE, WASHINGTON 98104  
(206) 622-2000

1 I, Alexander C. Cohen, declare as follows:

2 1. I am an attorney licensed to practice in the State of Florida and am admitted *pro hac*  
3 *vice* before this Court in this action. I am an associate of the law firm of Robbins Geller Rudman &  
4 Dowd LLP, and together with co-counsel, I represent the Plaintiffs in this case. I have personal  
5 knowledge of the matters stated herein, and, if called upon, I could and would competently testify  
6 thereto.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript  
8 of the deposition of Angela Sun, dated August 23, 2023.

9 3. Attached hereto as **Exhibits 2, 3, 4, and 5** are true and correct copies of documents  
10 produced in this action by Defendants to Plaintiffs, containing Bates Nos.  
11 AMZ\_GARNER\_00058354, AMZ\_GARNER\_00058345, AMZ\_GARNER\_00061349, and  
12 AMZ\_GARNER\_00061351, respectively.

13 I declare under penalty of perjury under the laws of the United States of America that the  
14 foregoing is true and correct.

15 Executed this 1st day of September, 2023, at Boca Raton, Florida.

16  
17 /s/ Alexander C. Cohen

18 Alexander C. Cohen  
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**EXHIBIT 1**  
**FILED UNDER SEAL**

EXHIBIT 2  
FILED UNDER SEAL

EXHIBIT 3  
FILED UNDER SEAL

EXHIBIT 4  
FILED UNDER SEAL

EXHIBIT 5  
FILED UNDER SEAL